

Comment on Eversource's December 16, 2024 submission to PUC DE-24-087, [Attachments](#) to Record Request Responses.

Eversource's document is part of a response to the PUC's request to Eversource to "...cite the authority or authorities that permit Eversource to proceed with its X178 and U199 transmission line upgrade projects and provide a copy of any specific authorization(s) granted."

The 344 pages in this attachment are permits that would be granted to any project as long as it fulfilled the basic requirements (text, numbers and photographs) and paid the compensations or bonds required. DES Alteration of Terrain and Dredge and Fill permits allow Eversource to excavate topsoil and subsoils, "alter" the existing contours of the land, build roads and construction pads and dredge and fill wetlands. DOT driveway permits allow Eversource to construct a temporary access road off of a DOT controlled road. These permits do not require Eversource to show it has been granted authority to build these projects. New Hampshire has no agency or siting council that assesses, and can authorize or reject, transmission projects (unless the SEC is requested and accepts, to take jurisdiction.)

These documents do show that Eversource's claims of dedicated outreach to landowners and the public are belied by the fact that Eversource signed the Alteration of Terrain and Dredge and Fill permits as the landowner, in violation of the requirements of the permits, in order to reduce public knowledge of what the project actually would be, if built. Eversource has cut easement-encumbered landowners out of the DES permitting process and thus severely limited the public's knowledge of the project plans. The PUC and SEC should reject the DES permits.

No easement-encumbered landowners were sent these permits or notification of alterations to these permits.

The New Hampshire office of the Attorney General/DOJ 'authorized' this exclusion.


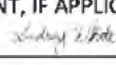
"What is [Regulatory Capture](#) "

Regulatory capture is a theory associated with George Stigler, a Nobel laureate economist/ It is the process by which regulatory agencies eventually come to be dominated by the very industries they were charged with regulating. Regulatory capture happens when a regulatory agency, formed to act in the public's interest, eventually acts in ways that benefit the industry it is supposed to be regulating, rather than the public."

Below: p. 139:


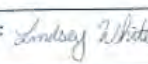
Eversource signed the X-178 (below) and U-199 DES permits as the landowner.

"The signature of the property owner certifies that the property owner has authorized the agent to act on the property owner's behalf for purposes of the notification."

<b>SECTION 10 - CERTIFICATIONS (Env-Wq 1406.18)</b>		
Initial each of the required certifications below.		
AF	1. The property owner shall sign the notification form below.	
AF	2. The signature(s) shall constitute certification that: the information provided is true, complete, and not misleading to the knowledge and belief of the signer; the signer understands that any permit by notification obtained based on false, incomplete, or misleading information is not valid; the project as proposed complies with the <u>minimum standards</u> established in RSA 483-B:9, V and will be constructed in strict accordance with the proposal; the signer accepts the responsibility for understanding and maintaining compliance with RSA 483-B and these rules; the signer understands that an accepted shoreland permit by notification shall not exempt the work proposed from other state, local, or federal approvals; the signer understands that incomplete notifications shall be rejected and the notification fee shall not be returned; and the signer is subject to the applicable penalties in RSA 641, <i>Falsification In Official Matters</i> .	
AF	3. The signature of the property owner certifies that the property owner has authorized the agent to act on the property owner's behalf for purposes of the notification. ( <input type="checkbox"/> Not Applicable)	
<b>SECTION 11 - REQUIRED SIGNATURE (RSA 483-B:5-b; Env-Wq 1406.18)</b>		
SIGNATURE (OWNER): 	PRINT NAME LEGIBLY: <b>Ashley Friend</b>	DATE: 5/7/2024
SIGNATURE (AGENT, IF APPLICABLE): 	PRINT NAME LEGIBLY: <b>Lindsey White</b>	DATE: 5/7/2024

[shoreland@des.nh.gov](mailto:shoreland@des.nh.gov) or (603) 271-2147  
 29 Hazen Drive, PO Box 95, Concord, NH 03302-0095  
[des.nh.gov](http://des.nh.gov)

Eversource claimed it was unable to provide Easton with digital copies of the AoT and Dredge and Fill Wetlands permits because the files “were too big,” hence the photograph:

<b>SECTION 14 - REQUIRED CERTIFICATIONS (Env-Wt 311.11)</b>		
Initial each box below to certify:		
Initials: KN	To the best of the signer's knowledge and belief, all required notifications have been provided.	
Initials: KN	The information submitted on or with the application is true, complete, and not misleading to the best of the signer's knowledge and belief.	
Initials: KN	The signer understands that: <ul style="list-style-type: none"> <li>• The submission of false, incomplete, or misleading information constitutes grounds for NHDES to:             <ol style="list-style-type: none"> <li>1. Deny the application.</li> <li>2. Revoke any approval that is granted based on the information.</li> <li>3. If the signer is a certified wetland scientist, licensed surveyor, or professional engineer licensed to practice in New Hampshire, refer the matter to the joint board of licensure and certification established by RSA 310-A:1.</li> </ol> </li> </ul>	
Initials: KN	If the applicant is not the owner of the property, each property owner signature shall constitute certification by the signer that he or she is aware of the application being filed and does not object to the filing.	
<b>SECTION 15 - REQUIRED SIGNATURES (Env-Wt 311.04(d); Env-Wt 311.11)</b>		
SIGNATURE (OWNER): 	PRINT NAME LEGIBLY: Kurt Nelson	DATE: 2/21/2024
SIGNATURE (APPLICANT, IF DIFFERENT FROM OWNER):	PRINT NAME LEGIBLY:	DATE:
SIGNATURE (AGENT, IF APPLICABLE): 	PRINT NAME LEGIBLY: Lindsey White	DATE: 2/21/2024

Easton received four printed applications, one Wetlands and three Alteration of Terrain, not clearly distinguishable by the covers. This caused confusion which was compounded by the limited Town Clerk's hours; Thursdays, from 1:00-6:00.

Note that Eversource has initialed the center section attesting that ***“If the applicant is not the owner of the property, each property own signature shall constitute certification by the signer that he or she is aware of the application being filed and does not object to the filing.”***

#### ◆ AI Overview

**No, a utility with a transmission easement is not the legal owner of the easement land; they only have the legal right to access and use that specific portion of land for the purpose of installing and maintaining their transmission lines, without actually owning the land itself.**

#### **Key points about easements:**

##### **Limited use:**

An easement only grants the utility company the right to use the land for a specific purpose, like installing power lines, not full ownership.

##### **Property owner retains rights:**

Even with an easement, the property owner still owns the land and can use it as long as they don't interfere with the utility company's access to maintain their infrastructure.

##### **Legal document:**

The right to an easement is established through a legal document, usually included in the property deed, clearly defining the boundaries and permitted uses.

Eversource, DES and the New Hampshire AG have taken the position “We can, so we will.” A landowner who does not know they were supposed to be given the DES permits cannot object to this. A landowner who discovers the deceit but not have the means to file a suit against Eversource and/or DES and/or the AG, cannot object in any effective way. If a New Hampshire court placed Eversource's interests above those of landowners and concurred that Eversource owns, rather than has transmission easements on, the hundreds of Eversource easement-encumbered properties, this would cause serious problems for the State and Eversource, but neither expect this to happen and Eversource has built 70+ asset condition projects without

sending the DES permits to any easement-encumbered landowner, and though some have objected, no lawsuit has been filed that I know of.

**Do Eversource, DES and the New Hampshire AG claim Eversource is also the property owner of the land for which it has distribution line easements?**

p. 133:

“ DES granted approval to waiving specific requirements of Env-Wq 1503.12(d)(1 & 2), Env-Wq 1503.21(d)(6 & 7), and Env-Wq 1504.09”

No landowners were notified of these waivers.

“1503.12 **(d)** Subject to (b) and (c), above, the amount of contiguous area disturbed shall include any actual or proposed terrain disturbance that occurs on the same property as the proposed project or is part of a larger plan of development: **(1)** Within 10 years before the commencement of any terrain alteration activity for the proposed project; and **(2)** Within 10 years after the terrain alteration activity for the proposed project ends.”

[Addressed in my comment dated 12/23/2024]

“1503.21 (d) The permit holder shall not deviate from the approved plans and specifications without applying for an amended permit or a new permit unless all of the following criteria are met:...

(6) The roadway centerline has not been relocated or has been relocated to no more than 20 feet from the center line of the roadway as originally approved;

(7) The center point of a parking area has not been relocated or has been relocated to no more than 20 feet from the center point of the parking area as originally approved”

Eversource can move the proposed roads more than 20’ on either side of the center line shown on the project plans. The “parking areas” not mentioned in public presentations by Eversource or shown on project plans, can also be moved 20 feet in either direction from the center line. This means the 100’ width of trees still standing in most of the easements can be cut.

“Env-Wq 1504.09 Stormwater Drainage Report; Drainage Area Plans; Hydrologic Soil Group Plans. **[Waived by DES]**

A stormwater drainage report, associated drainage area plans, and associated hydrologic soil group plans shall include the following:

(a) A narrative with the following information:



- (1) A description of the pre-development and post-development conditions affecting drainage;
- (2) The total impervious area assumed per lot, as applicable;
- (3) A discussion of how the proposed development is likely to impact hydrologically-connected surface waters of the state, and wetlands as defined in RSA 482-A, and other properties;
- (4) A comparison between the pre-development peak discharge rates and the post-development peak discharge rates, for the one-year, 2-year, 10-year, and 50-year, 24-hour storms;
- (5) A discussion of how treatment criteria will be met in accordance with Env-Wq 1507.03; and
- (6) A discussion of how groundwater recharge is met in accordance with Env-Wq 1507.04;

(b) Calculations for pre- and post-construction stormwater drainage, for 24-hour duration storms with minimum return frequencies of once in one year, 2 years, 10 years, and 50 years using the NRCS “National Engineering Handbook”, Part 630, Hydrology, or Win TR-20, version 3.20.0000, as developed by the NRCS for determining the rate of runoff, both available as noted in Appendix B, subject to the following:

(1) Depth of precipitation shall be determined using either of the following, both available as noted in Appendix B:

a. “Extreme Precipitation in New York and New England”, version 2.0, published by the USDA, NRCS, and Cornell University’s Northeast Regional Climate Center; or

b. NOAA’s National Weather Service, Hydrometeorological Design Studies Center, Precipitation Frequency Data Server;

(2) The time of concentration shall be determined as follows:

a. If using the Lag method for determining the time of concentration, identify the hydraulic length in feet and provide calculations for determining the average land slope in percent for each sub-basin;

b. If using the velocity method for determining the time of concentration, identify the sheet flow path(s), the shallow concentrated flow path(s), and the channel flow path(s) for each sub-basin; and

c. The sheet flow path identified in b. above, shall be limited to 100 feet;

(3) Except as required for solar arrays pursuant to Env-Wq 1511.05, the curve number for each sub-basin shall be calculated as follows:

a. For proposed areas of disturbance, including lot development, the hydrologic condition for woods, meadows, or pastures shall be assumed to be “good”, as defined by the National Engineering Handbook referenced in (b) above;

b. For proposed areas of disturbance, including lot development, soil types shall be identified in accordance with the Society of Soil Scientists of Northern New England (SSSNNE) Special Publication No. 3, Version 7.0, Site-Specific Soil Mapping Standards for New Hampshire and Vermont, July 2021, available as noted in Appendix B;

c. For all other areas that contribute runoff to the project site, soil types shall be:

1. Taken from the NRCS county-wide web soil survey at <http://websoilsurvey.nrcs.usda.gov>;

or

2. Identified in accordance with SSSNNE Special Publication No. 3, Version 7.0, Site-Specific Soil Mapping Standards for New Hampshire and Vermont, July 2021, available as noted in Appendix B; and

d. The hydrologic soil group shall be assigned in accordance with SSSNNE Special Publication No. 5, Ksat Values for New Hampshire Soils, September 2009, as available in Appendix B; and

(4) If the calculations are done using software that provides error messages, warnings, or other such indicators, such as HydroCAD®, a copy of the calculations shall be submitted that shows all error messages, warnings, and other such indicators;

(c) WQV, WQF, and GRV calculations;

(d) Calculations for designing outlet protection;

(e) Drainage area plans for pre- and post-construction that delineate each sub-basin, including off-site areas which flow onto the project area, at a scale for off-site areas of one inch equals 100 feet, or at a scale of one inch equals 2,000 feet if delineated from a USGS map, and at a scale of one inch equals 50 feet for on-site areas, identifying the following:

(1) The location of sub-basins, reaches, ponds, and all points of interest, as modeled in the stormwater drainage report;

(2) The hydraulic length or time of concentration flow path

(3) Contours for on-site areas at the same intervals as the plans prepared pursuant to Env-Wq 1504.02 through Env-Wq 1504.05, as applicable, and contours for off-site areas at the same interval or at the intervals on the applicable USGS map;

(4) Roadway station numbering, if applicable; and

(5) Drainage structures such as detention basins, culverts, and treatment practices;

(f) If the plans prepared pursuant to (e), above, for the on-site areas comprise more than 3 sheets at the specified scale, an overview sheet which shows the location of each 50-foot scale sheet and an outline of the area to be impacted by the proposed project; and

(g) Hydrologic soil group plans for pre- and post-construction that delineate each sub-basin, including off-site areas which flow onto the project area, identifying the following:

(1) The location of sub-basins, as modeled in the stormwater drainage report;

(2) The locations of the different soil groups using the following color-coding:

a. Hydrologic soil group A soils shall be shaded green;

b. Hydrologic soil group B soils shall be shaded yellow;

c. Hydrologic soil group C soils shall be shaded orange;

d. Hydrologic soil group D soils shall be shaded red;

e. Open water features shall be shaded blue; and

f. Impervious cover shall be shaded gray;

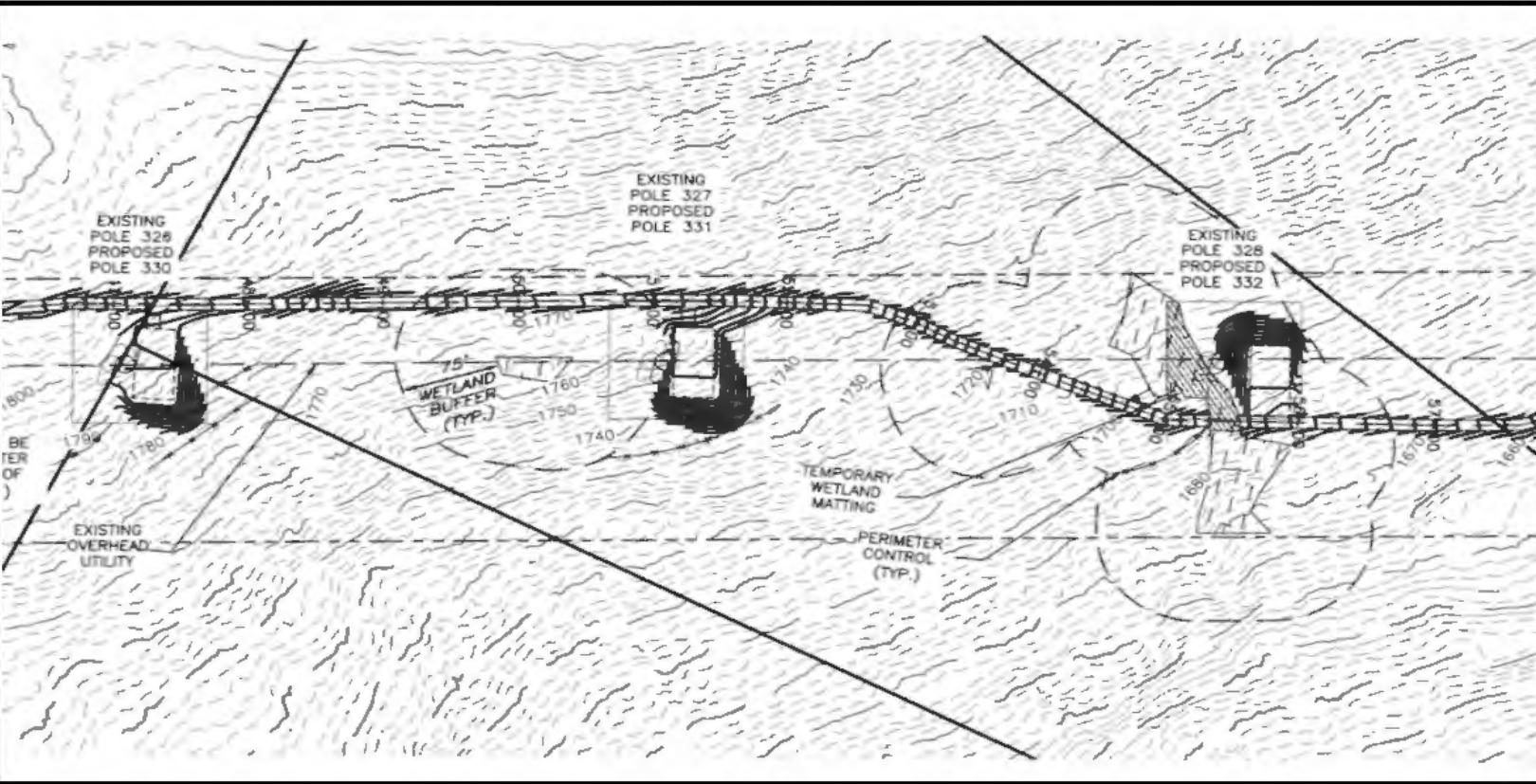
(3) The map symbol identifying the soil mapped; and

(4) A map legend.”

1504.09(e)(3) appears to require a post-construction map:

“ (e) Drainage area plans for pre- and post-construction that delineate each sub-basin, including off-site areas which flow onto the project area..(3) Contours for on-site areas

Easement-encumbered landowners have a right to see these post-construction plans. 2' contour lines as shown below should be required.



p. 135 below:

1. The applicant filed a Permit Amendment Request on July 29, 2024, requesting changes to Permit Condition #3 that identified 18 PRA wetlands where work was required to be completed outside the growing season.
2. NHDES conducted a field inspection on September 6, 2024, to view the 18 PRA wetlands, where possible, to evaluate the need for the time of year restriction based on individual wetland characteristics.
3. NHDES determined that three of the subject wetlands qualify as PRA wetlands that warrant a time of year restriction.
4. NHDES and the applicant met on September 17, 2024, to discuss the NHDES field inspection and the applicant's difficulty in completing the project with time of year restrictions.
5. The two parties reached an agreement that provides added protection for the highest value wetlands, while allowing the project to remain practicable. The results of the agreement include the Amended Permit conditions.”

“In New Hampshire, Priority Resource Areas (PRAs) are areas ...for which a greater level of protection is required.”

It appears that Eversource claimed it would be difficult for it to comply with the time of year restrictions DES placed on construction in 18 Priority Resource Area wetlands to give these wetlands the level of protection they require. It appears Eversource met with DES after deciding not to invite the landowners whose wetlands were being discussed to this meeting. DES removed the “greater level of protection” from 15 of the wetlands to make construction less expensive and perhaps faster for Eversource.

“In accordance with RSA 482-A:10, RSA 21-O:14, and Rules Ec-Wet 100-200, any person aggrieved by this decision may file a Notice of Appeal directly with the NH Wetlands Council (Council) within 30 days of the decision date, October 09, 2024.”

Unless they don't know about it, which appears to be the case for all of the waivers and permit amendments DES has given to Eversource for work on the X-178 and U-199.

p. 190: DOT permit for road access to the easement:

**This permit requires that a stone apron or wood matting be constructed from the edge of the highway pavement 25 feet into the site.**

**The highway shall be kept clean of all dirt and/or construction debris at all times. Failure to comply with this requirement may result in revocation of this permit.**







p. 204:

New Hampshire Department of Energy standard permit for crossing:

**C. Property Rights**

According to Eversource, abutters to the Ammonoosuc River, Moore Reservoir, and NHDOT/State-owned land in Littleton will not be affected by the proposed project, because the crossing structures are being replaced and rebuilt within existing right-of-way easements.

**D. Service to the Public and the Effect on Public Rights**

According to the application, the existing crossings were constructed, operated, and maintained to meet the reasonable requirements of service to the public. Eversource affirmed that the proposed modifications will continue to meet that public need and will not substantially affect the public's use and enjoyment of the public waters of the Ammonoosuc River, Moore Reservoir, or the State land parcel in Littleton.

The lines were constructed and easement sold (and condemned in some locations ) to meet the reasonable requirements of service to the public in 1948. The easements were not sold to meet the unlimited desires of the public, and construction or use of a line for this purpose violates the easements.

“According to Eversource... abutters will not be affected by the proposed project, because the crossing structures are being replaced and rebuilt within existing right-of-way easements.”

DOE ignores the permit requirement to consider property rights.

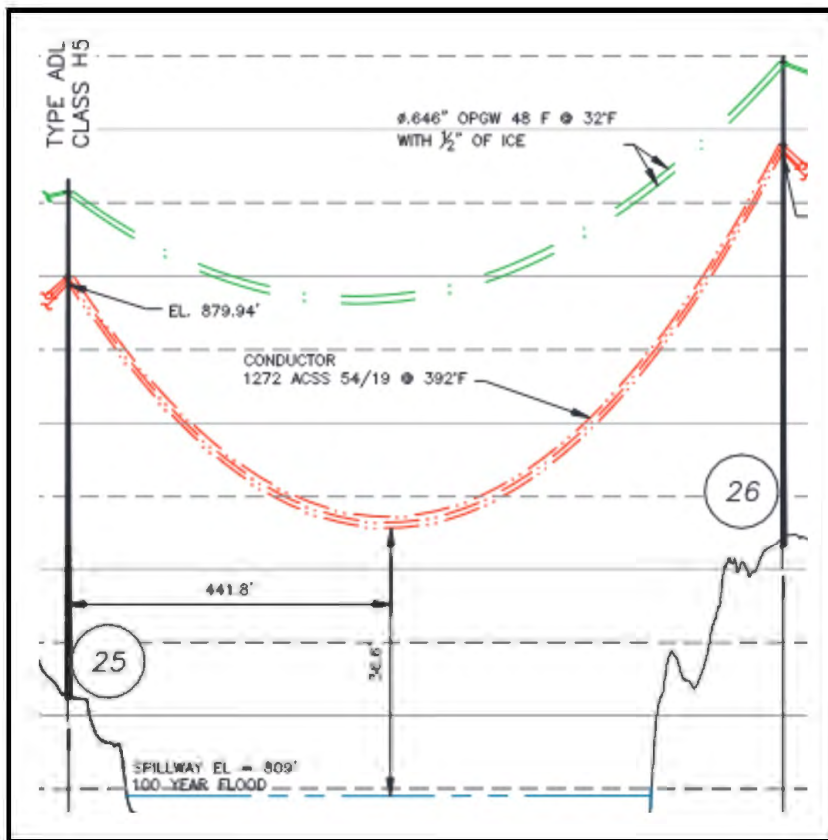
Neither DOE nor Eversource provide any documentation supporting their position that no replacement of transmission infrastructure within the easement will affect abutters.

**I request that DOE provide documentation that “the requested crossing amendments are necessary to meet the reasonable requirements of reliable service to the public.”**



This information would include, but is not limited to the definition of reasonable requirements at the time the easements were acquired, graphs of the current flowing in both directions on the X-178 and U-199 over the past five years, the increase in average consumer electricity consumption from 1948 to the present, and documentation of any failures of the existing lines.

Why did DOE permit Eversource's crossing of the Ammonoosuc, below, in which the required clearance is exceed by 33', thus apparently increasing structure heights by 35'?



Where are DOE's and Eversource's profiles of sag for the existing line with ACCC type conductor, recommended by the Federal DOE?

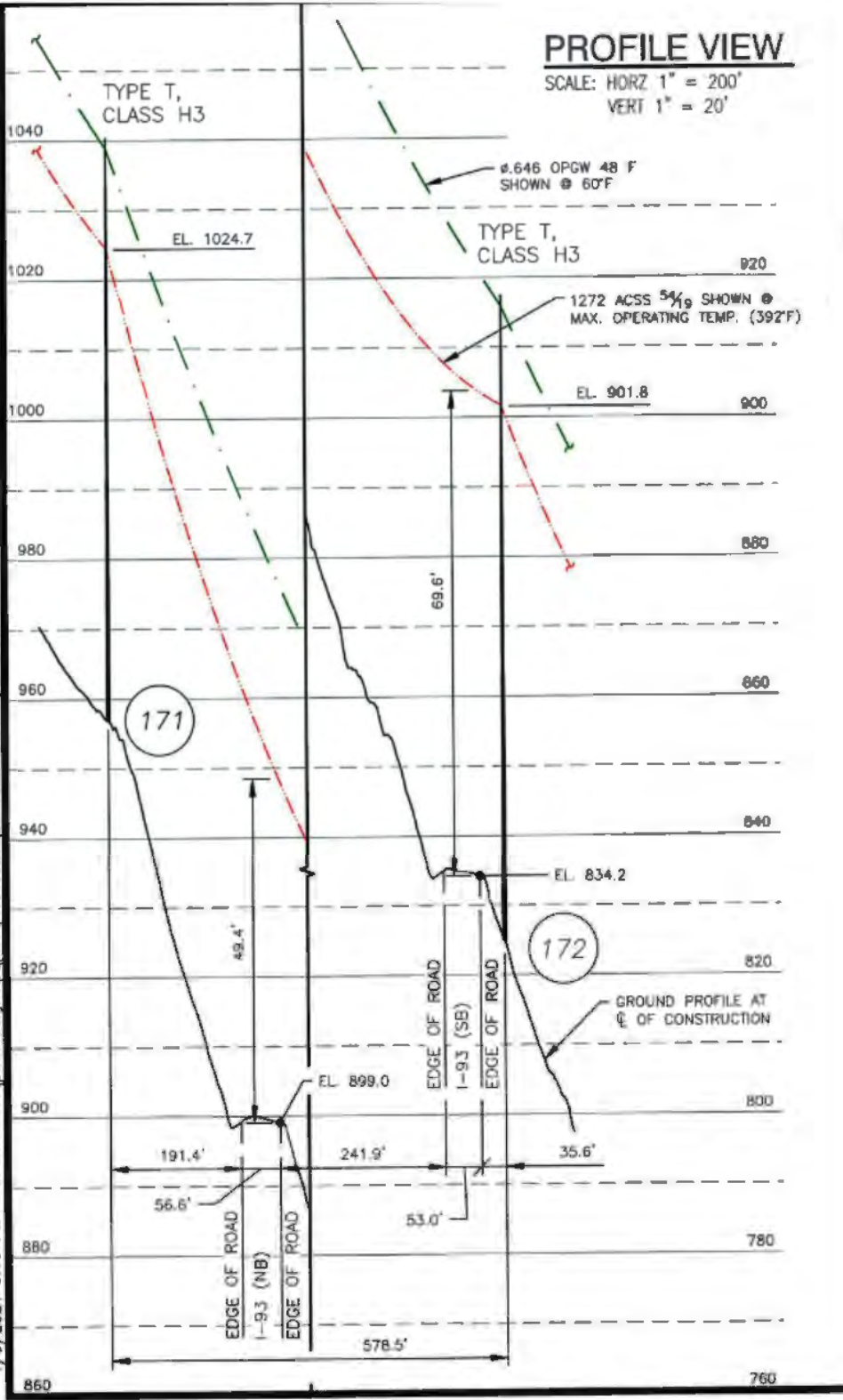
Below, X-178 crossing of I-93:

The 93' foot structure provides 69.6' clearance where 20.1' is required by Code. Eversource has not shown that this structure could not be 49.5', even laden with Eversource's standard retrograde 1272 ACSS conductor, nor has it shown that the 83' structure could not be 53.7'. Since Eversource can place transmission line so close to the highway, I suggest it run the X-178 from its crossing of I-93 in Bethlehem south alongside the already degraded corridor of I-93 to Bridgewater, or wherever its southernmost crossing is. That would protect Bog Pond and White Mountain National Forest, and those who use the power be the ones looking at the transmission lines. This could improve siting requirements and increase conservation of electricity.

1/9/2024 5:10 PM - Skern - C:\pwworking\pw1\d4049927\04100-81003.dwg - Exhibit 2

# PROFILE VIEW

SCALE: HORIZ 1" = 200'  
VERT 1" = 20'





P 285:

“The licensing history for the X178 line is complex with apparent inconsistencies, However, all State-owned land and public water crossings will be licensed as a result of this application.”

DOE decided not to do the necessary research on the X-178 licensing history or provide the documents it has, so though the X-178 and U-199 crossings may never have been licensed, and could be challenged, DOE has licensed them and eliminated Eversource’s problem.

Did it provide public notice of this decision affecting public waters and lands?

DOE concurred with Eversource’s position that the PUC did not have authority to investigate Eversource’s construction of 70+ asset condition projects in New Hampshire (DE-23-056.)

Why does the DOE now appear to be opposing Eversource in this docket, to the extent of quoting the PUC in DE-23-056:

“In Eversource’s Sur-Reply it argues that in Order 26,946 the “Commission confirmed that it would be ‘futile’ for it to review transmission rates approved by the Federal Energy Regulatory Commission (“FERC”), and any underlying determinations of prudence regarding transmission infrastructure investments, because ‘New Hampshire law is inapplicable to these rates.’”<sup>1</sup> Sur Reply p.3. In the prior Order in which the PUC initially declined to investigate and denied the petition, it wrote that it has “discretion” to initiate an investigation and that the Commission “appreciates the issues raised . . . .” and noted that “transmission costs are a major contributor to New Hampshire ratepayers’ high energy costs. . . . [T]he Commission agrees that expenditures on Asset Condition projects-to the extent they related to transmission costs-are a potentially worthy topic for the Commission to consider.” Order No. 26,925 in DE 23-056, p. 8 (emphasis added).”

Eversource did not include the AoT or Dredge and Fill Wetlands applications in this submission. The latter application, for the X-178 (2) contains undocumented claims. Eversource claimed, without providing supporting documentation, that 2022 inspections showed 41 out of 590 structures on the X-178 that needed replacement because of their condition (Category C.) When its plan of a complete line rebuild at a cost of \$380 m. met resistance at the PAC, Eversource claimed, without providing supporting documentation, that is 2024 inspections showed 115 more Category C (in need of replacement or repair at next maintenance cycle) structures.

Below: link to X-178 (1) AoT application:

[https://nhconservation.org/lib/exe/fetch.phpmedia=x178:final\\_aot\\_document.pdf](https://nhconservation.org/lib/exe/fetch.phpmedia=x178:final_aot_document.pdf)

## SECTION 2 - PROJECT DESCRIPTION (Env-Wt 311.04(i))

Provide a description of the project and the purpose of the project, the need for the proposed impacts to jurisdictional areas, an outline of the scope of work to be performed, and whether impacts are temporary or permanent.

Eversource is proposing to replace 106 existing utility structures along the X178-2 Transmission Line. The Site runs through portions of Woodstock, Easton, and Sugar Hill, New Hampshire. The maintenance work requires temporary wetland matting within wetlands for work pad placement and associated access to each structure. The X178-2 Transmission Line was originally built in 1969 and additional portions were built in 1985. During an inspection of the X178-2 Transmission Line, it was observed that the structures are old and worn and have been subjected to pole splitting, woodpecker damage and rot, and must be replaced due to the state of deterioration of these structures over the past 55/39 years. The proposed structure replacement work will require temporary impact to place temporary timber matting within wetlands for replacement work areas and associated access. In addition, temporary grading is required on steep slope wetlands to provide safe access and work pad areas. The existing wood structures will be replaced with a new steel counterpart and will require heavy machinery to install. Access and work pad locations in wetlands will be restored as part of required impact minimization. However, for mitigation purposes, Eversource proposes to submit a mitigation fee for temporary grading impacts, for proposed pole replacements in wetlands, and temporary wetland matting in PRA wetlands.

Above, X-178 (2) Phase 1 Dredge and Fill Wetland permit application:

“During an inspection [when, what kind, by whom?] of the X178-2 Transmission Line, it was observed that the structures [all of them, if not, which ones?] are old and worn and have been subjected to pole splitting, woodpecker damage and rot, [a description so vague as to be useless] and must be replaced [according to what standards, set by what authority?] due to the deterioration of these structures over the past 55/39 years.”

The X-178 (2) was replaced in 1985 so none of the structures are 55 years old.

This is an example of the kind of data DES accepts as accurate and adequate.

p. 23: U.S. Fish and Wildlife Service, another captured agency:

I confirm that both ESA-listed species and designated critical habitat under the jurisdiction of the USFWS and/or NMFS were considered in my evaluation. Yes

Identify the USFWS information sources used (Note: state resources are not acceptable):

Northern Long-eared Bat (Threatened): Based on the Natural Heritage Bureau memo NHB23-3543, NHB23-3544, and NHB23-3545 dated 12/14/2023, no Northern Long-eared Bat maternity roost trees or hibernacula are known near the site. In addition, no tree clearing is proposed during the pup season from June 1- July 31. Therefore, the project is consistent with the federal rules for Northern Long-eared Bat. The NLEB Fact Sheet provided by the USF&W has been attached above.

Canada Lynx (Threatened) - The site intersects the area of influence for Canada lynx and suitable habitat for this species may be present. However, the site does not contain Critical Habitat designated for Canada lynx, and no known records of Canada lynx are known near the site according to NHB23-3543, NHB23-3544, and NHB23-3545 dated 12/14/2023. In addition, the project is of a nature that will not result in take of lynx, and will not be enclosed in fencing that could unintentionally trap lynx. Therefore, the project is consistent with the federal rules for Canada lynx. The Canada lynx Fact Sheet provided by the USF&W has been attached above.

Monarch Butterfly (Candidate) - The proposed project involves maintenance within an existing utility right-of-way and will maintain in open scrub-shrub habitat.



“The site intersects the area of influence for Canada lynx and suitable habitat for this species may be present. However, the site does not contain Critical Habitat designated [by whom?] for Canada lynx, and no know[n] records of Canada lynx are known near the site according to NHB-23-3543, NHB-23-3544, and NHB-23-3545 dated 12/14/2023. In addition, the project is of a nature that will not result in take of lynx, and will not be enclosed in fencing that could unintentionally trap lynx. Therefore, the project is consistent with the federal rules for Canada Lynx.”

Apparently USFWS did not take into account the lack of winter hikers or others who might find signs of lynx in the mostly trailless area that surrounds the cleared powerline corridor.

Below: p. 62:

**\*\* DETERMINATION OF NO HAZARD TO AIR NAVIGATION \*\***

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Utility Pole X178-3 STR 552
Location:	Concord NH, NH
Latitude:	44-21-39.18N NAD 83
Longitude:	71-38-41.99W
Heights:	1082 feet site elevation (SE)
	66 feet above ground level (AGL)
	1148 feet above mean sea level (AMSL)

What is the correct town for this structure? My search places it in Whitefield:

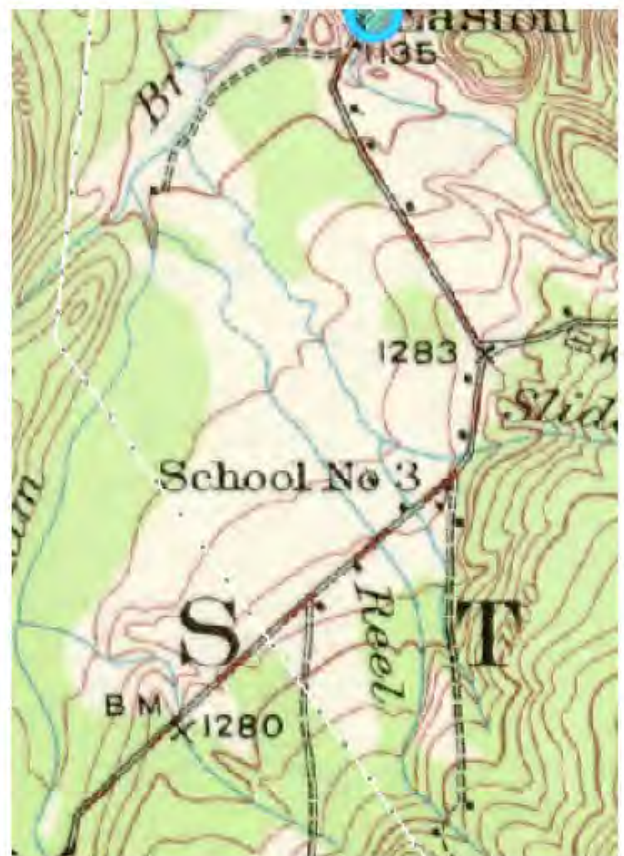
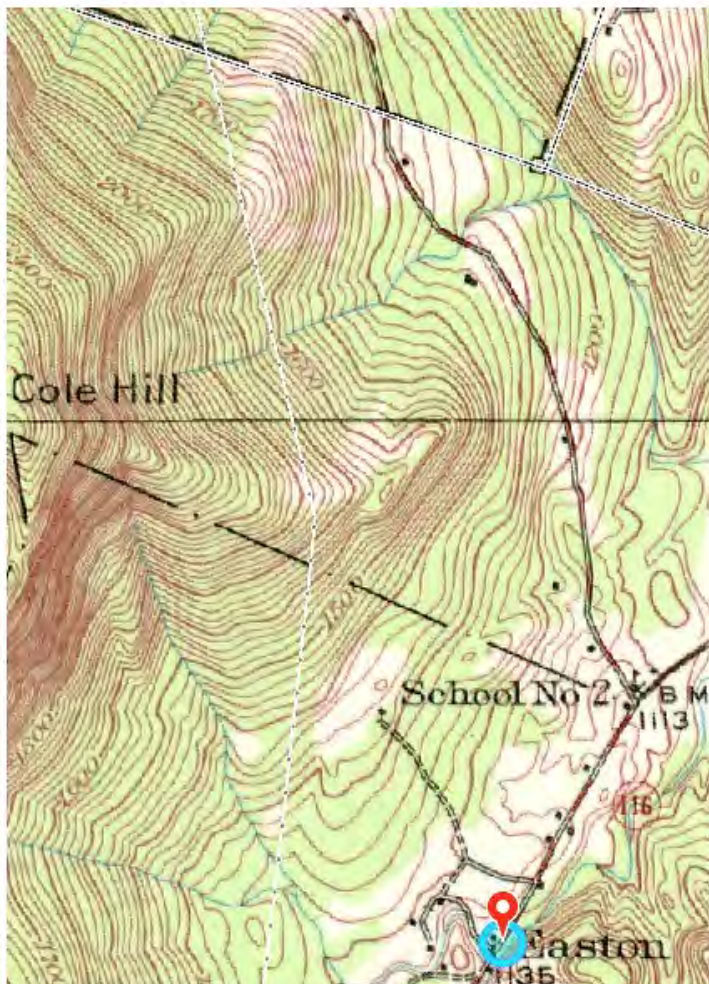




The coordinates given are in Lat/Lon (DMS) not any of the four types of NAD 83. Luckily the application required a map.

p. 26: EPA:

<b>Project Start Date:</b> <u>07/01/2024</u>	<b>Project End Date:</b> <u>12/31/2026</u>
<b>Types of Construction Sites:</b>	
• <u>Utility</u>	
<b>Will there be demolition of any structure built or renovated before January 1, 1980?</b> No	
<b>Will you be discharging dewatering water from your site?</b> Yes	
<b>Was the pre-development land use used for agriculture?</b> No	



1929 map. The pre-development land was used for pasture which was greater in extent than is shown on this map. Forest Service surveys and barbed wire show pasture



extending along the easement from at least the field west of the word “School” south and east to the field shown on the map above right.

**I request the PUC to require Eversource to re-file its permit application with the EPA with this question answered correctly.**

344 pages of ACE, FS, EPA, USFWS, F&G, DES, DOT, DNCR, and DOE permits; agencies that almost never refuse to grant a permit. Perhaps the PUC should ask for the % of permits these agencies deny. The various town permits also appear to be undeniable.

False data, sloppy errors. Eversource does not appear to expect anyone to read these documents.

Thanks to Bethlehem for denying Eversource’s “request” for a waiver from Bethlehem’s height restrictions

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